

Last Updated: November 10, 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

James J. Mauro

Plaintiff,

against

NYCDOE, Marie Guillaume

Defendant.

CIVIL ACTION NO.:

19-CV-04372 (GBD) (KHP)

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PROPOSED CASE MANAGEMENT PLAN FOR PRO SE CASE

1. Summary of Claims, Defenses, and Relevant Issues.

Plaintiff/Defendant (circle one)

Plaintiff brings this action alleging race discrimination in violation of Title VII, the SHRL, & the CHRL.

2. I understand my obligation to and am preserving relevant information.

Plaintiff/Defendant (circle one)

3. Proposed Schedule

All discovery should be completed by May 14, 2020

- a. Depositions: Depositions shall be completed by April 13, 2020
- b. Neither party may take more than 10 depositions. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.

- c. Initial Requests for Documents must be made by September 25, 2019
- d. Responses to Requests for Documents must be made by October 25, 2019
- e. Documents from third-parties (such as doctors) will/will not (circle one) be required. If required, the following are the third-parties from whom Documents will be requested.
- _____
- _____
- _____
- f. Subpoenas requesting Documents from third-parties must be served by November 15, 2019. Documents obtained from third-parties must be provided to all parties in this matter.
- g. There will/will not (circle one) be expert testimony in this case. If expert testimony will be needed, please describe the topic on which the expert(s) is expected to testify
- _____
- _____
- _____

4. Early Settlement or Resolution

The parties have have not (circle one) discussed the possibility of settlement. The parties request a settlement conference by no later than April 14, 2020. The following information is needed before settlement can be discussed:

5. Other Matters

Plaintiff(s)/Defendant(s) (circle one) wish to discuss the following additional matters at the Initial Case Management Conference.

Respectfully submitted this 7th day of August, 2019

James Mauro

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